

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

KRYSTAL JONES
5697 Longwood
Maple Heights, Ohio 44137

:

CASE NO.

:

And,

:

JUDGE:

KATHLEEN HUNTER
3839 E. 142 St.
Cleveland, Ohio 44128

:

Plaintiffs,

:

**COMPLAINT
(WITH JURY DEMAND)**

:

-vs.-

TRENT RICHARDSON
24752 Eagle Pointe Ct.
Columbia Station OH 44028

:

:

And,

:

SEVINA FATU
24752 Eagle Pointe Ct.
Columbia Station OH 44028

:

:

And,

:

TERRELL RICHARDSON
24752 Eagle Pointe Ct.
Columbia Station OH 44028

:

:

And,

:

JANE DOE #1
24752 Eagle Pointe Ct.
Columbia Station OH 44028

:

:

And,

:

JANE DOE #2 :
24752 Eagle Pointe Ct.
Columbia Station OH 44028 :

Defendants. :

Now come Plaintiffs by and through counsel, and for their complaint against Defendants states as follows:

THE PARTIES

1. Plaintiffs, Krystal Jones and Kathleen Hunter are residents of Cuyahoga County, Ohio.
2. Defendant Trent Richardson is a member of the Cleveland Browns Football Team and a resident of Ohio.
3. Defendant, Sevina Fatu is Defendant Trent Richardson's girl friend, the mother of his three children and a resident of Ohio who resides with Mr. Richardson at his compound in Columbia Station, Ohio.
4. Defendant, Terrell Richardson is the brother of Defendant Trent Richardson and resides with Mr. Richardson at his compound in Columbia Station, Ohio. Defendant, Terrell Richardson had been involved in a relationship with Plaintiff, Krystal Jones at various times during calendar year 2012.
5. Defendant, Jane Doe #1 and Defendant, Jane Doe #2 are believed to be friends and/or relatives of Defendant, Trent Richardson who either reside with Mr. Richardson at his compound or were social guests and invitees at said compound on December 10, 2013.

FACTUAL ALLEGATIONS

6. At all times Plaintiff, Krystal Jones was a personal friend of Defendant Trent Richardson, and a personal friend of Defendant, Sevina Fatu. Moreover, Plaintiff, Krystal Jones had been in a relationship with Defendant Terrell Richardson at various times during calendar year 2012 up until the time of the events complained of herein.
7. On December 9, 2012 Plaintiffs Krystal Jones and Plaintiff, Kathleen Hunter were at Rumors night club on W. 6 St. in Cleveland, Ohio. While there they became part of a group celebrating a Cleveland Browns victory along with Defendant, Sevina Fatu and other members of Defendant, Trent Richardson's family and/or entourage.
8. The celebration continued into the early hours of December 10, 2012 and after Rumors night club closed Plaintiffs were invited by Defendant Sevina Fatu, and other members of Trent Richardson's family and/or entourage to continue the party at Defendant Trent Richardson's compound on Eagles Point Court in Columbia Station, Ohio.
9. Plaintiffs departed Rumors in the company of Defendant, Sevina Fatu; Defendant, Jane Doe #1; and Defendant, Jane Doe #2. While walking to their respective vehicles parked in the Warehouse District of Cleveland, Plaintiffs were repeatedly asked by Defendant, Sevina Fatu to come to the Richardson compound to continue the celebration.
10. On their arrival Plaintiffs were social guests and invitees at the Richardson compound.
11. On their arrival inside the home within the Richardson compound Plaintiff, Krystal Jones inquired about Defendant, Terrell Richardson and his whereabouts.
12. Plaintiff, Krystal Jones was told by Defendant, Trent Richardson that Defendant, Terrell Richardson did not wish to speak with Plaintiff, Krystal Jones.

13. Plaintiffs, Krystal Jones and Kathleen Hunter were asked by Defendant Trent Richardson to leave the Richardson compound..
14. Plaintiffs, Krystal Jones and Kathleen Hunter complied and left Defendant, Trent Richardson's home.
15. While still in the driveway as Plaintiffs were entering their vehicle Defendant Trent Richardson became enraged, ran out of his home and shouted after them.
16. Defendant Trent Richardson verbally accosted Plaintiffs while they were in his driveway.
17. Defendant Trent Richardson shouted and cursed that Plaintiffs had "disrespected his house" by slamming a door.
18. As Plaintiffs attempted to leave the driveway Defendant Trent Richardson slammed his fist onto the hood of Plaintiff Krystal Jones' vehicle, denting the hood, causing damage in excess of \$1,500 and placing the Plaintiffs in fear for their safety.
19. Defendant Trent Richardson then stood behind Plaintiff's vehicle preventing them from backing up and called for Defendant Sevina Fatu to come out and attack Plaintiffs.
20. Defendants, Sevina Fatu; Jane Doe #1; Jane Doe #2 and Defendant Terrell Richardson exited the house and came out to the driveway.
21. Defendant, Trent Richards shouted curses, and commands, insisting that Defendant Sevina Fatu, come out of the house and physically assault the Plaintiffs in retribution for "disrespecting" Mr. Richardson's house.
22. Acting on Defendant Trent Richardson's urging and obeying his commands, Defendant Sevina Fatu opened the driver's door and began pummeling Plaintiff Kathleen Hunter with her fists as Plaintiff Hunter sat in the drivers seat.

23. Acting on Defendant Trent Richardson's urging and obeying his commands, Defendant, Sevina Fatu struck Plaintiff Kathleen Hunter numerous times on her face and then pulled Plaintiff Kathleen Hunter out of the vehicle by her hair.
24. Defendant, Sevina Fatu joined by Defendants Jane Doe #1 and Jane Doe #2 continued to beat and pummel Plaintiff Hunter with their fists and feet at the urging of and obeying the commands of Defendant Trent Richardson who urged them and instructed them to do so.
25. Defendant, Trent Richardson and Defendant, Terrell Richardson by their physical presence, their actions and their verbalized urging, lent support and encouragement to Defendants Fatu, Jane Doe #1 and Jane Doe #2 and placed Plaintiff Kathleen Hunter in fear that these large, and formidable men would injure her as well.
26. Defendant Sevina Fatu, joined by Defendants, Jane Doe #1 and Jane Doe #2 then turned their physical attacks against Plaintiff Krystal Jones.
27. Defendant Sevina Fatu, Defendant Jane Doe #1 and Defendant Jane Doe #2 proceeded to beat and pummel Plaintiff Krystal Jones with their fists and feet at the urging and commands of Defendant Trent Richardson in the driveway of the Richardson compound.
28. Defendant Trent Richardson and Defendant Terrell Richardson by their physical presence, their actions and their verbal urgings, lent support and encouragements to Defendants Fatu, Doe #1 and Doe #2 and placed Plaintiff, Krystal Jones in fear that these two large, and formidable men would injure her as well.
29. Plaintiffs were eventually able to free themselves from their attackers, enter their vehicle and drive away from Richardson compound.
30. Once they had escaped their attackers and driven a short distance away, Plaintiffs stopped their vehicle, called Police and sought emergency medical attention.

31. As the direct and proximate result of the acts complained of Plaintiffs have suffered bodily injuries including but not limited to lacerations and bruises of the face and body; injuries of the eye and soft tissue injuries which will be demonstrated at Trial.
32. As the direct and proximate result of the acts complained of Plaintiffs have suffered serious emotional harm including but not limited to fear, embarrassment, humiliation, anxiety and mental distress.

COUNT ONE (BATTERY)

33. Plaintiffs re aver each paragraph stated above as though fully re written.
34. The intentional acts committed by these Defendants constitute civil battery.

COUNT TWO (ASSAULT)

35. Plaintiffs re aver each paragraph stated above as though fully re written.
36. The intentional acts committed by these Defendants constitute civil assault.

COUNT THREE (EMOTIONAL DISTRESS)

37. Plaintiffs re aver each paragraph stated above as though fully re written.
38. The intentional acts committed by these Defendants constitute the intentional infliction of emotional distress.

COUNT FOUR (CIVIL CONSPIRACY)

39. Plaintiffs re aver each paragraph stated above as though fully re written.
40. The intentional acts committed by the Defendants constitute a civil conspiracy chiefly orchestrated by Defendant Trent Richardson and designed to cause harm, bodily injury and emotional distress to Plaintiffs, Krystal Jones and Kathleen Hunter.

COUNT FIVE (FALSE IMPRISONMENT)

41. Plaintiffs re aver each paragraph stated above as though fully re written.
42. The intentional acts committed by the Defendants in depriving the Plaintiffs of their ability to voluntarily leave the Richardson compound constitute a false imprisonment.

COUNT SIX (OTHER CIVIL TORTS)

43. Plaintiffs re aver each paragraph stated above as though fully re written.
44. The intentional acts committed by the Defendants constitute civil torts alternatively known as aiding and abetting; working in concert; and criminal solicitation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for separate individual judgments against Defendants jointly and severally in a monetary amounts which will make them whole and compensate them for their individual medical expenses; pain and suffering; and damage to property. Plaintiffs also pray for punitive damages and the award of attorney fees based on the intentional conduct of these Defendants and for any and all other forms of legal and equitable relief which this Court deems appropriate based upon its determination of the facts.

Respectfully submitted,



Leif B. Christman (00700014)
Matthew F. Browarek (0040341)
Neal R. Nandi (0071730)
2000 Standard Building
Cleveland, Ohio 44113
(216) 363-6036
Attorneys for Plaintiff

JURY DEMAND

Plaintiffs request a jury of the maximum number allowable on all issues so triable.


Leif B. Christman

CERTIFICATE OF SERVICE

A COPY OF THE FOREGOING HAS BEEN SENT ON THIS 22ND DAY OF MARCH, 2013
VIA REGULAR UNITED STATES MAIL TO:

ANTHONY PETRUZZZI
TUCKER ELLIS LLP
925 Euclid Avenue,
Suite 1150
Cleveland, Ohio 44115

A handwritten signature in black ink, appearing to read "Leif B. Christman", written over a horizontal line.

LEIF B. CHRISTMAN